

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

**DECLARATION OF MAYA R. KALONIA
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL**

I, Maya R. Kalonia, declare:

1. I am an attorney in the law firm of Girard Sharp LLP, and counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated by Uber as "CONFIDENTIAL" and /or "HIGHLY CONFIDENTIAL – ATTORNEYS EYES ONLY", Plaintiff filed the following under seal:

Document	Description	Designating Party
[Unredacted] Plaintiff's Opposition to Uber's Motion to Quash Trial Depositions	Portion of briefing referring to documents and testimony designated highly confidential and confidential	Uber
Exhibit A	Henry (Gus) Fuldner 3/26/2025 and 3/27/2025 deposition transcript	Uber
Exhibit B	Katy McDonald 5/7/2025 deposition transcript	Uber

Document	Description	Designating Party
Exhibit C	Sunny Wong 6/25/2025 deposition transcript	Uber
Exhibit D	Sunny Wong 10/14/2025 deposition transcript	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 17, 2025 in San Francisco, California.

/s/ Maya R. Kalonia
Maya R. Kalonia